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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Alberto Mpiana Da Mesquita E Melo,

Plaintiff,

v.

U.S. Citizenship and Immigration Services
(USCIS), et al.,

Defendant.

Case No. 2:24-cv-01030-JAD-EJY

**Joint Stipulation and Order to
Stay the Proceedings (Seventh
Request)**

ECF No. 29

Plaintiff and Defendants, through their undersigned counsel, hereby stipulate and jointly request that the Court stay all deadlines in this matter and hold this case in abeyance for an additional period of 30 days, or until **June 5, 2025**.

The subject of this litigation concerns Plaintiff's I-485 application for adjustment of status and I-601 application for waiver of grounds of inadmissibility. Plaintiff asserts Defendants have unduly delayed the processing of his I-485 and I-601 applications.

The parties have conferred and may resolve this matter without continued litigation. Since the Complaint was filed, USCIS granted Plaintiff's I-601 application, as reported in the fifth Joint Stipulation to Stay the Proceedings (ECF No. 25). Further, Plaintiff, through counsel, submitted a parole request, which USCIS forwarded to the third-party agency with the authority to adjudicate it: U.S. Immigration and Customs Enforcement (ICE). (ECF No. 27). ICE's adjudication of the parole request may resolve impediments to the I-485 application, which is currently pending with USCIS.

1 As of today, the parole request is still under review and pending with ICE. The
2 parties have agreed to maintain the I-485 application open during the pendency of the
3 parole request and, if necessary, during the preparation and consideration of any additional
4 materials pertinent to the I-485 application.

5 The parties hereby request an extension of the stay in the district court proceedings
6 to allow the parties an opportunity to receive an adjudication from ICE regarding Plaintiff's
7 parole request and conclude the administrative process. Pending the conclusion of the
8 remaining administrative processing of Plaintiff's I-485 application and parole request, this
9 litigation may become moot.

10 This is the seventh request to stay the proceedings. This request is not sought for
11 purposes of delay or any other improper purpose, but to facilitate the parties' efforts to
12 resolve the matter in a "just, speedy, and inexpensive" manner consistent with Fed. R. Civ.
13 P. 1. The parties reserve the ability to seek additional time to finalize resolution, if
14 necessary.

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Respectfully submitted this 7th day of May 2025.

THE BROOKS LAW FIRM, APC

SIGAL CHATTAH
United States Attorney

/s/ Carlo Brooks

/s/ Christian R. Ruiz

CARLO BROOKS

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ORDER

Based on the parties' stipulation [ECF No. 29] and with good cause appearing, IT IS ORDERED that the stay of this case is extended through June 5, 2025.


United States District Judge

DATED: May 8, 2025